

**Covered Device Recycling Act (CDRA or Act)
Act 108 of 2010
Enacted November 23, 2010**

Frequently Asked Questions

Note: the following information is intended to be a summary. Exclusion of information from this summary does not diminish the responsibilities of affected parties under the CDRA. For complete information regarding these responsibilities, refer to the [CDRA](#).

Information in this document is subject to change as program guidelines are developed.

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► **General Information**

What is a “Covered Device”?

Covered devices include: desktop and notebook computers, computer monitors, computer peripherals, and televisions marketed and intended for use by consumers in the Commonwealth of Pennsylvania.

What is a “computer peripheral”?

A computer peripheral is a keyboard, printer or any other device sold exclusively for external use with a computer that provides input into or output from the computer. The term does not include adaptive or assistive technologies.

What devices are NOT included in the CDRA?

The CDRA definitions of covered device, computer, covered computer device, and covered television device contain a number of specific exclusions, including:

- Televisions with viewable screens smaller than four inches;
- A telephone of any type, including a mobile phone;
- An automated typewriter, professional workstation, server, portable handheld calculator, portable digital assistant, global positioning system, MP3 player or other similar device;

- Devices that are functionally or physically part of:
 - Equipment intended for use in an industrial, governmental, commercial, research and development, or medical setting;
 - Equipment used for security, sensing, monitoring, antiterrorism, or emergency services purposes;
 - Equipment designed and intended primarily for use by professional users;
- A component or part of a motor vehicle;
- Devices that are contained in an appliance.

Who is a “Consumer” under the CDRA?

For the purposes of the CDRA, a consumer is an occupant of a single or multi-family home that uses the covered devices for personal or small business purposes. For purposes of this definition a small business is an entity that is independently owned or operated, employs 50 or fewer people, has purchased or leased a covered computer device from a computer manufacturer or retailer and, but for the program established under the CDRA, would not otherwise have access to electronic recycling programs.

Why do televisions, computers and their peripherals, and computer monitors need to be recycled?

These devices should be recycled because they often contain toxic metals, such as lead, cadmium or mercury, as well as other materials that have the potential to negatively impact the environment if disposed. Additionally, the use of recycled materials to manufacture new products reduces the consumption of natural resources. For example, by recycling over 1.2 million tons of steel in 2005, Pennsylvanians reduced the mining of 1.4 million tons of iron ore, 829,786 tons of coal, and 71,124 tons of limestone.

The CDRA mandates manufacturers who sell desktop and laptop computers, computer monitors or televisions in Pennsylvania to begin offering covered device recycling programs to Pennsylvanians by January 1, 2012.

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► Information for Residents

What are the requirements for residents under the Covered Device Recycling Act?

On January 24, 2013, a disposal ban on covered devices goes into effect, after which no person may dispose of a covered device or any of its components with their municipal waste. From this date forward, residents will be required to recycle their covered devices (televisions, computers, computer monitors, and computer peripherals).

Where can I recycle my televisions, computers, monitors and peripherals?

There are a number of electronics recycling programs currently operating in Pennsylvania that provide collection points where residents can drop-off covered devices and other electronics for

recycling or reuse. And beginning January 1, 2012, manufacturers of covered devices are required to establish and conduct ongoing collection and recycling programs for covered devices.

Information regarding local drop off locations is available on DEP's [Electronics Recycling web page](#) (www.dep.state.pa.us, choose "DEP Programs A – Z," then choose "Electronic Recycling").

Local recycling options can also be obtained by calling DEP's recycling hotline at 1-800-346-4242, by contacting your [County Recycling Coordinator](#) (, choose "DEP Programs A—Z," then choose "Recycling"), or by contacting your local electronics retailer.

Will I be charged a fee for recycling my electronic devices?

The CDRA prohibits manufacturers and retailers from charging consumers (including home-based businesses) a fee for the collection, transportation, or recycling of a covered device (desktop and notebook computers, computer monitors, computer peripherals, and televisions) unless a financial incentive, such as a coupon or rebate, of equal or greater value is provided.

However, collection locations may charge fees for covered devices if they are not a retailer and are not affiliated with a manufacturer's recycling program.

Additionally, any collection location, regardless of whether they are a retailer or are affiliated with a manufacturer's recycling program, may charge a fee for the recycling of non-covered devices.

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► Information for Manufacturers

What are the requirements for manufacturers under the CDRA?

The manufacturer requirements established by the CDRA apply only to covered device manufacturers that offer their covered devices for sale in Pennsylvania. However, these requirements do not apply to manufacturers of only computer peripherals.

In brief – beginning January 1, 2012, a covered device manufacturer that offers its new covered devices for sale in Pennsylvania must:

- Annually register its covered device brands with DEP, and affix brand labels to its new covered devices.
- Establish and conduct ongoing recycling programs that offer no cost covered device collection opportunities to consumers (including home-based businesses). No cost means no fee may be charged unless a financial incentive, such as a coupon or rebate, of equal or greater value is provided. The devices collected through these programs must be properly recycled at certified electronics recycling facilities.
- Report annual covered device sales, collection and recycling data to DEP.

Additional information regarding these requirements is available below and on the [Manufacturer Requirements](#) page.

What is a covered device manufacturer?

A covered device manufacturer is a person who:

- Manufactures covered computer or television devices to be sold under its own brand as identified by its own brand label, or manufactures covered devices being sold under a brand it is licensed to use;
- Sells covered computer or television devices manufactured by others under its own brand as identified by its own brand label; or
- Assumes the duties imposed on a computer or television manufacturer under the CDRA.

This term does not include a person who manufactures only computer peripheral devices.

What if a manufacturer does not offer covered devices for sale in Pennsylvania?

The CDRA requirements do not apply to covered device manufacturers that do not offer their devices for sale in Pennsylvania, either through retail outlets or on-line or catalog sales.

What implementation dates are important to manufacturers?

There are several important dates that will impact manufacturers.

- **August 1, 2011**, – The Department of Environmental Protection (Department or DEP) began accepting recycling plans, registrations and registration fees from manufacturers August 1, 2011. The registration fee must be submitted with the registration.
- **January 1, 2012, and annually thereafter** –
 - Beginning January 1, 2012, no manufacturer may sell a new covered device in the Commonwealth unless it has registered with the Department and its collection and recycling plan has been approved by the Department.
 - The CDRA provides the Department with **60** days to review manufacturer recycling plans. If the Department rejects the plan, the manufacturer or group of manufacturers has **30** days to revise and resubmit the plan. *Manufacturers should build this into their planning timeframes in order to allow for approval of their plans prior to January 1, 2012.*
 - Manufacturers must renew their registration annually by January 1 of each calendar year in order to continue selling their covered devices in Pennsylvania.
- **January 30, 2013, and annually thereafter** – Manufacturers must submit an annual report to DEP that includes data pertaining to their annual sales and collection of covered devices in Pennsylvania for the prior year.
- **January 30, 2013, and annually thereafter** – Manufacturers must renew or update their collection and recycling plans with DEP.
- **March 15, 2014, and annually thereafter** – Manufacturers that fail to meet their obligated share for the collection and recycling of covered devices in Pennsylvania during the previous year must submit to DEP a payment to cover the cost of collecting, transporting and recycling the unmet portion of its obligated share plus an additional 10%.

Can a manufacturer sell a covered device in Pennsylvania if it is not labeled with the device brand?

Beginning **January 1, 2012**, a manufacturer may not sell a new covered device in Pennsylvania if the device is not labeled with a brand that has been registered with the Department.

Who must submit a plan?

Each manufacturer who offers its covered device for sale in Pennsylvania shall either individually, or as part of a group, submit a plan to meet its obligated share for the collection and recycling of covered devices.

Manufacturers of only computer peripherals are not required to submit a plan.

What must the initial covered device collection and recycling plan include?

Recycling plans must include:

- The methods used to collect covered devices, including the names and locations of collection sites.
- The names and locations of utilized recyclers and the recycling processes they use.
- A means to publicize collection opportunities, collection locations, and educate consumers, including a website or toll-free telephone number.
- The intention of the manufacturer(s) to fulfill its obligated share under this Act.
- For the initial plan, an estimate of the weight to be collected in the first calendar year.

Do additional requirements apply when renewing a recycling plan with DEP?

When renewing its recycling plan with DEP, a manufacturer or group of manufacturers that failed to meet its obligated share responsibility for the collection and recycling of covered devices during the previous calendar year must include information that demonstrates the process by which the collection of covered devices will be increased by a minimum of 2% per year during subsequent calendar years.

Manufacturers that successfully met their obligated share responsibility during the previous calendar year may resubmit the previous year's plan or may choose to update it, so long as the changes meet the criteria outlined in the CDRA.

Will the Department actively determine where and how covered devices are managed?

The Department will not actively make that determination so long as the collection, storage, transportation and processing of the covered devices meet the criteria outlined in the CDRA, any subsequent regulations, and the guidance developed under the CDRA and other applicable environmental laws and regulations. The Department does however encourage the use of existing covered device collection infrastructure to the extent that it is available to at least 85% of the Commonwealth's population on an ongoing basis, is cost effective, and is environmentally sound.

Do the recycling facilities utilized by manufacturers need to meet any requirements? How will this be enforced?

Beginning January 1, 2012 facilities that process or recycle covered devices (whether located in or outside of PA) that are collected from consumers (including home-based businesses) through any electronics collection program in Pennsylvania, whether manufacturer, retailer, municipal, etc., must have achieved and maintained one of the following certifications:

- R2 (Responsible Recycling Practices Standard) Certification,
- e-Stewards Certification,
- An internationally accredited third-party environmental management standard for the safe and responsible handling of covered devices.

Under current PA Residual Waste Regulations, a facility that is located in Pennsylvania must obtain DEP general permit #[WMGR081](#) to process electronic equipment and components (electronic waste) by sorting, disassembling or mechanical processing and to beneficially use the electronic waste. This permitting requirement remains in effect, even though a facility must also be certified.

Out-of-state facilities must demonstrate compliance with all applicable rules and regulations in the state in which they are located in addition to having the R2 or e-Stewards certification.

This will be enforced by management facility reviews at the time of registration, plan reviews, and random audits of annual reports from the manufacturers.

Can DEP recommend any electronics recyclers? Will the Department publish a list of approved recycling facilities meeting the requirements of the CDRA?

The Department cannot recommend any electronics recyclers.

However, the Department will keep a list of facilities on its [Electronics Recyclers web page](#) that meet the criteria established under the CDRA.

Can a manufacturer charge a fee for the collection, transportation or recycling of a covered device?

A manufacturer may not charge consumers (including home-based businesses) a fee for the collection, transportation, or recycling of a covered device, unless a financial incentive, such as a coupon or rebate, of equal value is provided to the consumers.

Do manufacturers have to make recycling of covered devices available to businesses?

Manufactures are required to make collection and recycling programs available to home-based businesses, but do not have to make them available to other businesses. Manufacturers may collect covered devices originating from any entity in PA, but only those devices collected from consumers (including home-based businesses) may be counted toward a manufacturer’s obligated share responsibility.

What are the manufacturer reporting requirements?

Annual reports submitted by manufacturer to DEP shall include:

- The total weight of covered devices sold to households in the United States and an estimate of the total weight of covered devices sold to households in Pennsylvania during a previous calendar year;
- The total weight of covered devices collected from consumers in Pennsylvania during the previous calendar year; and
- Documentation verifying the collection and recycling of the devices.

May a group of manufacturers submit a combined annual report?

Yes, a group of manufacturers that conducted a covered device collection and recycling program under an approved plan during the previous year may submit a combined report. However, the sales data, obligated share and collection data must be reported individually for each manufacturer in the group.

Are a manufacturer's computer peripherals, such as printers, included in the calculation of its obligated share?

Yes, a manufacturer of desktop computers, laptop computers, computer monitors or televisions must count any computer peripherals it manufactures when calculating its obligated share. Likewise, a manufacturer may count the peripherals it collects for recycling, regardless of who manufactured the peripherals, towards its obligated share responsibility.

Will the Department divulge sales data submitted by individual manufacturers?

The CDRA stipulates that sales data submitted to the Department is exempt from disclosure under the PA Right-to-Know Law of 2008, and it will not be disclosed by the Department unless otherwise required by law or court order.

When completing the annual report, does the manufacturer count the weight collected, or the weight recycled and/or prepared for reuse?

Manufacturers must report the total weight of covered devices collected from consumers (including home-based businesses), along with documentation that verifies the collection and recycling of the covered devices.

Can covered devices collected and recycled from businesses be counted towards a manufacturer's obligated share responsibility?

No. Only covered devices that are collected from consumers, including home-based businesses, may be counted towards a manufacturer's obligated share. Covered devices collected from other business sources may not be counted towards the manufacturer's obligated share.

Can manufacturers meet their obligated share responsibility by recycling non-covered devices such as DVD players or MP3 players?

No. Only covered devices can be counted towards a manufacturers obligated share.

How will orphan and legacy waste (older cover devices that are no longer manufactured) be managed? The CDRA does not require manufactures to manage orphaned and legacy covered devices. However, collection of such covered devices will count towards a manufacturer’s obligated share responsibility. For this reason, the Department believes that most manufacturers will be willing to accept orphaned devices through their recycling programs.

What is the penalty for non-compliance with the CDRA?

Enforcement actions may be initiated by the Commonwealth for failure by a manufacturer to submit an annual registration form, remit an annual registration fee, or label its new covered devices with a brand. Penalties will range up to \$10,000 for the first violation and \$25,000 for subsequent violations.

A manufacturer that violates any other requirement of the CDRA may be assessed a penalty of up to \$1,000 for the first violation and up to \$2,000 for subsequent violations.

Additionally, a manufacturer that fails to meet its obligated share responsibility for the collection and recycling of covered devices in Pennsylvania must submit to DEP a payment to cover the cost of collecting, transporting and recycling its unmet portion plus an additional 10%.

When will the cost per pound penalty be determined?

The cost per pound penalty will be determined by DEP toward the end of each calendar year, beginning in 2012.

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► Information for Retailers

Does the CDRA impact what products a retailer may sell?

Yes. Beginning **January 1, 2012**, no retailer may sell or offer for sale a new covered device in Pennsylvania unless the brand is registered with the Department and subsequently is included on the list (*insert link*) of registered manufacturers maintained by the Department on the Department’s website. A retailer may continue to sell covered device brands that are no longer registered so long as the brands were included on the list of registered brands maintained by the Department at the time the covered devices were ordered by the retailer. Additionally, a retailer may not sell a covered device in Pennsylvania if the device is not affixed with a brand label.

What are the educational responsibilities of a retailer under the CDRA?

Retailers must provide information to its customers about the manner in which covered devices can be recycled, and of locations for the collection and return of these devices. This can be accomplished through one or more of the following methods:

- Posting information regarding how and where customers can recycle their covered devices.
- Posting and providing the Department's toll-free recycling hotline telephone number (800-346-4242).
- Posting and providing the Department's electronics recycling internet website.
- Providing retailer developed information.

Can a retailer operate its own collection and recycling program or participate in a manufacturer's program?

Yes, a retailer can operate its own collection program either in conjunction with or separately from a manufacturer's program. A retailer operating its own collection program is responsible for ensuring that covered devices collected from consumers (including home-based businesses) are managed at a facility that meets the management standards specified in the Act (i.e. the facility is R2 certified, e-Stewards certified or has an internationally accredited third-party certification for the safe and responsible handling of covered devices).

Additionally, no retailer may charge a fee or cost to consumers (including home-based businesses) for the collection, transportation or recycling of a covered device unless a financial incentive, such as a coupon or rebate, of equal value is provided to the consumers.

Are there penalties for retailers in violation of the CDRA?

For retailer violations, penalties may be assessed by the Department up to \$1,000 for first violations and up to \$2,000 for subsequent violations.

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► Information for Electronic Recyclers and Collection Points

The Department will not be an active market participant in the recycling of covered devices. The recycling of the covered devices is the responsibility of the individual manufacturer or group of manufacturers conducting a covered device collection and recycling program. The Department will not determine where or how specific devices are recycled. The Department will however approve or disapprove of recycling facilities based upon each facility's ability to meet the requirements of the CDRA.

What requirements must an electronics recycling facility meet? How will this be enforced?

Whether located in or outside of Pennsylvania, facilities that recycle covered devices that are collected from consumers (including home-based businesses) through any electronics collection program in Pennsylvania, whether manufacturer, retailer, municipal, etc., must have achieved and maintained one of the following certifications:

- R2 (Responsible Recycling Practices Standard) Certification,
- e-Stewards Certification,
- An internationally accredited third-party environmental management standard for the safe and responsible handling of covered devices.

Current PA Residual Waste Regulations, requiring electronics processing/recycling facilities that are located in Pennsylvania to obtain a DEP general permit #[WMGR081](#) (regarding the recycling and beneficial use of electronic equipment and components by sorting, disassembling or mechanical processing) prior to processing any electronic devices or electronic waste, will remain in effect.

Out-of-state facilities must demonstrate compliance with all applicable rules and regulations in the state in which they are located, in addition to having the R2 or e-Stewards certification.

This will be enforced by management facility reviews at the time of registration, plan review, and random audits of annual reports from the manufacturers.

Are electronics recyclers required to register with the Department?

Electronics recyclers are not required to register with the Department. However, as outlined above, depending on their location and the type of electronics material they recycle, electronics recyclers may be subject to the certification requirements established by the CDRA and/or the permitting requirements of PA's Residual Waste Regulations. They may also need to demonstrate compliance with environmental rules and regulation in their own state.

Do recycling facilities that are located in Pennsylvania and operating under general Permit WMGR081 need to obtain a certification?

R2, e-Stewards or third-party certification is not necessary to obtain general permit WMGR081. However, an electronic recycler operating with a permit but not the proper certification may not recycle covered device material collected from consumers (including home-based businesses) in Pennsylvania after January 1, 2012.

What about exports?

Exports of covered devices will be dictated by EPA regulation and guidance as well as the R2 certification standards, e-Stewards certification standards, or other internationally accredited third party certification standards under which the recycler is operating.

Will the Department actively determine where and how covered devices are managed?

The Department will not actively make that determination so long as the collection, storage, transportation and processing of the covered devices meet the criteria outlined in the CDRA, regulations promulgated under the CDRA, guidance developed under the CDRA and other

applicable environmental laws and regulations. The Department will, however, encourage the use of existing covered device management infrastructure to the extent that it is available to at least 85% of the Commonwealth's population on an ongoing basis, is cost effective, and is environmentally sound.

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► **Information for Existing Government and Nonprofit Collection Programs**

How will the existing one-day and ongoing electronic collection programs be supported?

Existing electronic collection programs may continue to register under the Department's Act 190 Household Hazardous Waste Program. Programs will continue to be eligible for reimbursement of eligible expenses. However, if participating in a covered device manufacturer's recycling program, expenses that are reimbursed by the manufacturer are not eligible for Act 190 reimbursement.

Do the electronics recycling facilities utilized by government and non-profit collection programs need to meet any requirements? How will this be enforced?

Whether located in or outside of Pennsylvania, facilities that recycle covered devices that are collected from consumers (including home-based businesses) through any electronics collection program in Pennsylvania, whether municipal, manufacturer, retailer, etc., must have achieved and maintained one of the following certifications:

- R2 (Responsible Recycling Practices Standard) Certification,
- e-Stewards Certification,
- An internationally accredited third-party environmental management standard for the safe and responsible handling of covered devices.

Current PA Residual Waste Regulations, requiring electronics recycling facilities that are located in Pennsylvania to obtain a DEP general permit #[WMGR081](#) (regarding the processing and beneficial use of electronic equipment and components by sorting, disassembling or mechanical processing) prior to processing any electronic devices or electronic waste, will remain in effect.

Out-of-state facilities must demonstrate compliance with all applicable rules and regulations in the state in which they are located, in addition to having the R2 or e-Stewards certification.

This will be enforced by management facility reviews at the time of registration, plan review, and random audits of annual reports from the manufacturers.

Can DEP recommend any electronic recyclers? Will the Department publish a list of approved recycling facilities meeting the requirements of the CDRA?

The Department cannot recommend any electronic recyclers.

However, the Department will keep a list of facilities on its Electronics Recycling web page (*insert link*) that meet the criteria established under the CDRA.

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► **Information for Landfills, Resource Recovery Facilities, Transfer Station and Haulers**

When does the disposal ban go into effect? What materials are included and excluded by the disposal ban?

A disposal ban on covered devices goes into effect January 24, 2013, after which no person may dispose of a covered device or any of its components with their municipal waste. These devices and their components must be properly recycled and may not be taken to nor accepted by landfills or resource recovery facilities for disposal or processing.

Covered devices include desktop and laptop computers, computer monitors, computer peripherals, and televisions. The disposal ban does not apply to other electronic devices. Non-hazardous residuals of covered devices that are produced during the recycling of those devices by solid waste disposal facilities are excluded from the disposal ban.

How does the CDRA affect waste haulers and transfer stations?

Once the disposal ban for covered devices goes into effect on January 24, 2013, licensed waste haulers and transfer stations may not intentionally accept covered devices for disposal from any source of waste, including businesses or municipal waste generators; and they may not knowingly commingle covered devices with waste destined for disposal or resource recovery.

What is an owner/operator of a landfill or resource recovery facility required to do?

Once the disposal ban for covered devices goes into effect on January 24, 2013, landfills and resource recovery facilities may not accept covered devices or their components for disposal or resource recovery. However, they may accept non-hazardous residuals produced during the recycling of covered devices.

Owners and operators will not be found in violation of the CDRA if they do all of the following:

- 1) Make a good faith effort to comply with the CDRA.
- 2) Post a sign stating that they do not accept any covered devices or their components at the facility.
- 3) Provide written notice to all collectors registered to deposit solid waste at the facility that covered devices or their components are not accepted at the facility.

What type of enforcement action will DEP take if an inspector observes a covered device being improperly disposed?

DEP will make a concerted educational and outreach effort to all landfills, resource recovery and transfer stations. If the owner/operator has performed the actions detailed above, unintentional disposal of covered devices is not punishable under the CDRA.

Penalties for repeated and intentional disposal of covered devices are discussed below. Generators, landfills, resource recovery facilities, transfer stations and haulers may all be held liable, depending on the situation.

Are there penalties for violation of this Act?

Any person who violates any requirement of the CDRA may be assessed a penalty of up to \$1,000 for the first violation and up to \$2,000 for subsequent violations.

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► Information for Businesses Discarding Covered Devices

How does the CDRA impact businesses?

There are two main areas where the CDRA will impact businesses.

- 1) Beginning January 1, 2012, home-based businesses in Pennsylvania may participate in manufacturer and retailer sponsored covered device collection and recycling programs at no cost. No cost means no fee may be charged by manufacturers or retailers to collect, transport, or recycle a covered device unless a financial incentive, such as a coupon or rebate, of equal or greater value is provided.
- 2) Beginning January 24, 2013, no business may dispose of a covered device or any of its components with its municipal waste. From that point forward, all covered devices and their components must be properly recycled. Prior to January 24, 2013, all appropriate regulations regarding hazardous waste determinations must continue to be made and the material managed accordingly.

Will my business be charged any fees for the recycling of its electronic devices?

The CDRA prohibits manufacturer and retailer sponsored covered device collection and recycling programs from charging a fee or cost to home-based businesses for the collection, transportation, or recycling of their covered devices unless a financial incentive of equal or greater value is offered.

The CDRA does not prohibit any fees for the collection, transportation or recycling of any electronic devices originating from businesses that are not home-based.

However, collection locations may charge fees if they are not a retailer and are not affiliated with a manufacturer's recycling program. Any collection location, regardless of whether they are a retailer or are affiliated with a manufacturer's recycling program may charge a fee for the recycling of non-covered devices.

If my business is not home-based, what does it need to do?

The CDRA does not impose any requirements on businesses that are not home-based until the disposal ban for covered devices goes into effect on January 24, 2013. From that point forward, covered devices and any of their components may not be disposed with municipal waste and instead

must be properly recycled. Even then, businesses are not required to utilize a certified electronics recycling facility for their electronics recycling needs. However, businesses are strongly encouraged to begin utilizing certified electronics recycling facilities for their electronics recycling needs. Whether or not a certified facility is utilized, if the facility is located in Pennsylvania, it must have obtained general permit #[WMGR081](#) (regarding the processing and beneficial use of electronic equipment and components by sorting, disassembling or mechanical processing) from DEP.

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